



ROPES & GRAY LLP  
1211 AVENUE OF THE AMERICAS  
NEW YORK, NY 10036-8704  
WWW.ROPESGRAY.COM

April 15, 2020

Christopher P. Conniff  
T +1 212 596 9036  
christopher.conniff@ropesgray.com

**BY ECF**

Hon. Naomi Reice Buchwald  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Application granted.  
Dated: April 15, 2020

Re: *United States v. Roberson*, No. 1:19-cr-914

A handwritten signature in blue ink that reads "Naomi Reice Buchwald". Below the signature is a printed name and title.

NAOMI REICE BUCHWALD  
UNITED STATES DISTRICT JUDGE

Dear Judge Buchwald,

As counsel for Marcus Roberson in the above-captioned matter, we write to respectfully request an additional one-week extension of the deadlines the Court set regarding the filing of any possible motion to suppress in this case. We seek this brief additional time because we have not been able to set up a legal call with our client since the date of the last adjournment. This is our second request for an adjournment.

As laid out in our last letter to the Court, we requested additional time to file our motion so that our client could review the upcoming motion, including his affidavit. Shortly following that request, we mailed the draft motion papers to our client and sought to arrange a legal call. In fact, we contacted the MCC on April 9 and April 10 in an effort to schedule this call. The MCC never responded to our emails, but instead placed an unscheduled call to my associate on April 13. Unfortunately, he was not available to pick up the call.<sup>1</sup> We made a follow-up request to the MCC shortly thereafter, and again yesterday, and have not received a response.

While we remain hopeful that the MCC will respond to our latest request before Thursday, we respectfully make this request in order to secure additional time, if necessary, to review our motion papers with our client. If the Court grants this request, the corresponding briefing schedule will be as follows: initial motion papers due on April 23; government's opposition due on May 7; and reply papers, if any, due on May 14. My colleague, Ethan Thomas, has discussed this request with AUSA Elinor Tarlow, and she consents to the revised schedule.

---

<sup>1</sup> We also learned from Mr. Roberson's mother that our client was rushed to the hospital last week and underwent an emergency appendectomy. This may account for the MCC's failure to respond.

ROPES & GRAY LLP

Hon. Naomi Reice Buchwald

- 2 -

April 15, 2020

Respectfully submitted,

*/s/ Christopher P Conniff*

Christopher P. Conniff

cc: Elinor Lynn Tarlow, Assistant United States Attorney (via ECF)